

Everything a Banker Needs to Know About ABA's Voter Education Program

What is ABA's Voter Education Program's purpose?

The Voter Education Program (VE) was established in 2018 to help elevate the banking industry's voice in the national dialogue through our issue advocacy, polling, research, and "Get Out the Vote" efforts. Over the years, the ABA has used this platform to highlight and support the efforts of members of Congress to enact legislation vital to the work of our industry. You can check out our previous activities on our website aba.com/votereducation.

Why is participating in Voter Education important?

Since 2018, more than \$10 million was spent advocating for the banking industry. The program has been committed to amplifying the voice of our vital industry through broadcast, radio, digital, and print. In order to continue this important work, we need the support of organizations like yours. Please consider a corporate contribution to our program. Our donation form has additional information on ways to contribute, or visit aba.com/vedonate to give via credit card.

Voter Education Governance

Who is on the Voter Education Advisory Council? What is their role?

The Voter Education program is governed by an Advisory Council comprised of ABA members in good standing, who represent a diverse set of banks, representatives from the State Association Alliance and managed by duly appointed ABA staff. Council members are appointed for 2-year terms and may be reappointed.

The role of the Council is split into three parts: to advocate, to advise, and to fundraise. Council members help advise staff on the operations of ABA's Voter Education program to the benefit of ABA and the banking industry.

Voter Education Donations

Who does Voter Education solicit for contributions?

There are no restrictions on who can be solicited for donations to the Voter Education program. However, the Voter Education team primarily solicits funds for our advocacy efforts from ABA members who serve on an ABA chair-appointed committee or councils. In addition, ABA makes a corporate commitment to donate to the program.

Are there restrictions on who can support the ABA's Voter Education program?

Yes, because the program could include political activities, there may be restrictions on the types of funding that can be accepted to support the ABA's Voter Education program.

Under Federal law, a nationally chartered bank, which includes a national bank, commercial bank, or a federal savings association (including savings and loan associations and federal savings banks) and other federally chartered corporations are prohibited from engaging in certain political activities. These restrictions would not apply, for example, to:

- A state chartered bank;
- A holding company affiliated with a national bank or savings and loan if the holding company has sufficient income derived from other sources;
- Affiliates or subsidiaries of a national bank or savings and loan with their own income; and

Questions? Contact the Voter Education Team at votereducation@aba.com

- Individual executives and board members.

Federal law similarly prohibits foreign nationals from engaging in certain political activities. A “foreign national” can be a non-U.S. citizen (unless he or she is residing in the U.S. as a lawful permanent resident as evidenced by a “green card”) or a partnership, association, corporation, or other entity that is organized under the laws of or has its principal place of business in a foreign country.

If you would like more information on the donor restrictions for the Voter Education program, please contact our team at votereducation@aba.com.

How much can individuals or organizations donate to the Voter Education program?

There are no limits on the size of donations that corporations, trade associations or individuals can make to support the ABA’s voter education program.

Are contributions publicly reported and recognized?

No, the Internal Revenue Service does not publicly disclose the identity of donors to and members of Section 501(c)(6) organizations such as the ABA. That protection extends to all contributions donors make to the ABA, including those related to the ABA’s Voter Education program.

Some of the ABA’s Voter Education program activities may be subject to Federal Election Commission (“FEC”) disclosure requirements, but the ABA structures all of its activities, including the Voter Education program, in a manner that does not require the disclosure of any of the ABA’s donors to the FEC. To that end, the ABA does not accept donations that are earmarked for specific political purposes. The ABA exercises full discretion over how it uses its donated funds and informs donors to the ABA’s Voter Education program: “The ABA does not solicit or accept funds earmarked for specific political purposes.”

Voter Education Activities

How does the Voter Education program decide where to engage?

Decisions of where to get involved are made and executed by ABA staff for legal purposes. We evaluate members of Congress and their work advocating for pro-banking policies by considering:

- Input from our State Association partners;
- The district they represent;
- The level of support they receive from ABA BankPac;
- Support of pro-banking issues and level of engagement.

How does the Voter Education program determine which tactics to utilize?

In coordination with seasoned ad vendors, who provide insights into ad trends and tactics, we consider:

- Media market of target’s district;
- How to maximize our budget for the activity;
- Demographics of key constituencies for our message;
- Creating a multi-channel strategy to spread our message across mediums.

What are the key differences between contributing to BankPac, a Super PAC, and the ABA's Voter Education Program?

A PAC	A Super PAC	The ABA
<ul style="list-style-type: none"> • A PAC is registered as a political committee with the FEC in order to make federal contributions to federal candidates or committees. • Individuals may contribute up to \$5,000 per calendar year to a PAC and there are significant restrictions on who may be solicited to contribute to a PAC. • Corporations are prohibited from contributing to a PAC. • Contributions of more than \$200 per calendar year are publicly disclosed. 	<ul style="list-style-type: none"> • A Super PAC is registered as a political committee with the FEC in order to make independent expenditures to advocate the election or defeat of federal candidates; a Super PAC is prohibited from making contributions to federal candidates or committees. • There are no limitations on the amounts that may be contributed to a Super PAC; there are some restrictions on who can contribute to a Super PAC. • Contributors of more than \$200 per calendar year to a Super PAC are publicly disclosed. • Most Super PACs have no membership structure, no grassroots messaging capabilities, and little or no name identification among the public. 	<ul style="list-style-type: none"> • The identities of ABA donors are protected from public disclosure. • The ABA can engage in many of the same activities as a Super PAC. These activities include airing television and radio advertisements, sending mail, making phone calls, putting staff on the ground, and conducting traditional and electronic get-out-the-vote operations. • The ABA can accept unlimited donations and is segregating funds for its Voter Education program to avoid restrictions that could apply to certain political activities that may be conducted as part of the program. • The ABA has significant national membership and, therefore, grassroots capabilities in states and congressional districts.